

EXHIBIT A

Highly Confidential - Marc Edwards, Ph.D.

Page 679

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

-----) Civil Action No.:
IN RE: FLINT WATER CASES) 5:16-cv-10444-JEL-MKM
) (consolidated)
)
) Hon. Judith E. Levy
-----) Mag. Mona K. Majzoub

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF MARC EDWARDS, PH.D.

TUESDAY, AUGUST 11, 2020

Volume 3

Continued remote oral deposition of MARC EDWARDS, PH.D., conducted at the location of the witness in Blacksburg, Virginia, commencing at approximately 9:04 a.m., on the above date, before JULIANA F. ZAJICEK, a Registered Professional Reporter, Certified Shorthand Reporter, Certified Realtime Reporter and Notary Public.

Highly Confidential - Marc Edwards, Ph.D.

Page 769

1 A. Across the city, yes, not in an individual
2 house.

3 Q. So let -- let's assume we have a home with
4 a lead service line and for -- for example there --
5 there -- I'll go through a list of potential sources
6 and you tell me if you agree that they are potential
7 sources and then if there is anything you want to add,
8 you can do that, okay?

9 A. Okay.

10 Q. Lead interior plumbing?

11 A. Is a source.

12 Q. Lead solder?

13 A. It's part of lead interior plumbing.

14 Q. Okay. Lead pigtails?

15 A. Yes.

16 Q. Leaded brass fixtures?

17 A. Yes.

18 Q. Galvanized pipe?

19 A. Yes.

20 Q. Anything else?

21 A. Lead service line if you didn't say that,
22 but...

23 Q. The -- so, do any of -- so explain to
24 us -- explain to me what you mean when you say for a

Highly Confidential - Marc Edwards, Ph.D.

Page 770

1 particular -- all -- although lead service lines are
2 the most significant contributor for the City, for a
3 particular house that might not be true, assuming I
4 just captured what you said a few minutes ago?

5 A. So, for instance, there was a house that
6 measured amongst the highest in the first two rounds
7 of sampling in the first and second draw in the city.
8 I was very interested about what has happening at this
9 house because it was less than LeeAnne's house but --
10 during the ground zero event -- but still high, above
11 a thousand. It is important to know where the lead is
12 coming from if you are trying to address the
13 corrosivity of the water and how to fix it.

14 So, I actually paid to have every inch of
15 that house's plumbing extracted, with the help of the
16 City of Flint, they paid for the service line, I paid
17 for the interior plumbing. I wrote a check out of my
18 own pocket because the hypothesis was that to get
19 levels of lead that high, there must be a lead pipe
20 out there somewhere, and we extracted every inch of
21 that and there was no lead pipe anywhere.

22 So, the source in that case was lead
23 solder. So the worst house in several of the sampling
24 rounds in Flint didn't have a lead pipe. So I

Highly Confidential - Marc Edwards, Ph.D.

Page 771

1 disproved the hypothesis that, you know, if you have
2 really, really high lead, you must have a lead pipe.
3 To my shock, that wasn't true.

4 Q. Okay. Other than that one anecdotal
5 instance, were -- were there other homes that fit
6 that -- that scenario?

7 A. None that I paid to extract all of the
8 pipe to prove it, but it had the fingerprints of lead
9 solder and not lead pipe. When you -- when you have
10 lead from lead solder, lead is -- lead solder has lead
11 and tin in it. So if you see high lead with high tin,
12 it is kind of like a fingerprint, if you will. Lead
13 from lead pipe doesn't have tin, right. So if I see
14 high lead with high tin, that's a solder, likely,
15 fingerprint, as the source of lead. Yeah, there were
16 other homes, not just that one that had lead solder
17 problems.

18 Q. Okay. So, in -- in the fall of 2015, we
19 know that the City switched back to Detroit water, and
20 would you agree that in fairly short order the
21 corrosivity problem was brought under control?

22 A. The corrosivity problem was immediately
23 solved because in the grand scheme of things the new
24 water is relatively non-corrosive compared to what had

Highly Confidential - Marc Edwards, Ph.D.

Page 936

1 DEPOSITION ERRATA SHEET

2

3

4 Case Caption: Flint Water Cases

5

6 DECLARATION UNDER PENALTY OF PERJURY

7

8 I declare under penalty of perjury that I
9 have read the entire transcript of my Deposition taken
10 in the captioned matter or the same has been read to
11 me, and the same is true and accurate, save and except
12 for changes and/or corrections, if any, as indicated
13 by me on the DEPOSITION ERRATA SHEET hereof, with the
14 understanding that I offer these changes as if still
15 under oath.

16

17 MARC EDWARDS, PH.D.

18

19

20 SUBSCRIBED AND SWORN TO

21 before me this day

22 of , A.D. 20__.

23

24 Notary Public